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Attorney for Material Witnesses

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(Magistrate Judge McCurine)

UNITED STATES OF AMERICA; Plaintiff, vs. BLANCA ESTRELLA-MORAN, Defendant.	Criminal Case No: O7CR3116-LAB Magistrate Case No. 07MJ2461 **MOTION FOR MATERIAL WITNESS'S VIDEOTAPED DEPOSITION** DATE: November 29, 2007 TIME: 9:00 am HON: William McCurine

TO UNITED STATES ATTORNEY KAREN P. HEWITT OR HER REPRESSENTATIVE AND JODI THORPE, ATTORNEY FOR DEFENDANT:

NOTICE IS HEREBY GIVEN that on November 29, 2007 at 9:30.00 am, or as soon thereafter as the matter may be heard, in the courtroom of Honorable William McCurine of this court, located at 940 Front Street, San Diego, California 92101, Material Witness, Jose Castro dela Cruz by and through their attorney of record, Linda A. King, will move the court for an order authorizing the videotaped deposition of the material witnesses.

The motion will be made on the ground that there is good cause for the order requested in that the material witnesses know of no sureties in this country who will bond them out of INS's Custody during the pendency of this matter. Neither the interests of justice nor the convenience of the parties and witnesses will be served by requiring the material witnesses to remain in INS's Custody until the matter is concluded.

Date: ________________________________

S/Linda A. King ___________
Linda A. King
Attorney for Material Witness(es)